BEFORE THE

PUBLIC UTILITIES COMMISSION

OF THE STATE OF HAWAII

PUBLIC UTILITIES

In the Matter of the Application of

HAWAIIAN ELECTRIC COMPANY, INC.

For Approval of Rate Increases and Revised Rate Schedules and Rules, and for Approval and/or Modification of Demand-Side and Load Management Programs and Recovery of Program Costs and DSM Utility Incentives. **DOCKET NO. 04-0113**

DEPARTMENT OF DEFENSE'S ELEVENTH
SUBMISSION OF INFORMATION REQUESTS
TO HAWAIIAN ELECTRIC COMPANY, INC.

AND

CERTIFICATE OF SERVICE

RANDALL Y.K. YOUNG Associate Counsel (Code 09C) Naval Facilities Engineering Command, Pacific 258 Makalapa Drive, Suite 100 Pearl Harbor, HI 96860-3134 Telephone (808) 474-5514

ATTORNEY FOR DEPARTMENT OF DEFENSE

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	_)	

DEPARTMENT OF DEFENSE'S ELEVENTH SUBMISSION OF INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY, INC.

COMES NOW, DEPARTMENT OF DEFENSE ("Applicant") by and through its undersigned attorney, and hereby submits its Eleventh Submission of Information Requests to Hawaiian Electric Company, Inc. ("HECO").

DATED: Honolulu, Hawaii, May 27 2005.

RANDALL Y.K. YOUNG

Associate Counsel (Code 09C)

Naval Facilities Engineering Command, Pacific

258 Makalapa Drive, Suite 100

Pearl Harbor, HI 96860-3134

Telephone (808) 474-5514

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DEPARTMENT OF DEFENSE'S ELEVENTH SUBMISSION OF INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY, INC.

INSTRUCTIONS

In order to expedite and facilitate Department of Defense's review and analysis in the above matter, the following is requested:

- For each response, HECO should identify the person who is responsible for preparing the
 response as well as the witness who will be responsible for sponsoring the response
 should there be an evidentiary hearing;
- 2. Unless otherwise specifically requested, for applicable schedules or workpapers, HECO should provide hard copies of each schedule or workpaper together with one copy of each such schedule or workpaper on electronic media in a mutually agreeable format (e.g., Excel and Quattro Pro, to name two examples); and
- 3. When an information request makes reference to specific documentation used by HECO to support its response, it is not intended that the response be limited to just the specific document referenced in the request. The response should include any non-privileged memoranda, internal or external studies, assumptions, HECO instructions, or any other relevant authoritative source which HECO used.
- 4. Should HECO claim that any information is not discoverable for any reason:
 - a. State all claimed privileges and objections to disclosure;
 - b. State all facts and reasons supporting each claimed privilege and objection;

- c. State under what conditions HECO is willing to permit disclosure to Department of Defense (e.g., protective agreement, review at business offices, etc.); and
- d. If HECO claims that a written document or electronic file is not discoverable, besides complying with subparagraphs 4(a-c), identify each document or electronic file, or portions thereof, that HECO claims are privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).
- 5. Please provide each response in electronic format (if available) as well as paper. Please provide two copies of each response, with one copy going directly via overnight delivery to Department of Defense's consultant at the following address:

Mr. Ralph Smith Larkin & Associates 15728 Farmington Road Livonia, MI 48154 Telephone No.: 734-522-3420 E-mail: RSmithLA@aol.com

and the other copy going directly via overnight delivery to:

Dr. Kay Davoodi Utilities Rates and Studies Office NAVFAC Washington 1314 Harwood Street, S.E. Washington Navy Yard, DC 20374-5018 Telephone No.: 702-685-3319

E-mail: Khojasteh.Davoodi@navy.mil

DEPARTMENT OF DEFENSE'S ELEVENTH SUBMISSION OF INFORMATION

REQUESTS TO HAWAIIAN ELECTRIC COMPANY, INC.

DOCKET NO. 04-0113

The following information requests are directed to HECO.

- DOD/HECO-IR-11-1. Impact of HECO 2005 sales forecast updates on revenue, fuel expenses, and other expenses that vary directly with sales.
 - a. Please provide the amount of increased and decreased revenues by rate that is associated with HECO's update of its test year 2005 sales forecast that was shown in HECO's 5/4/05 "Listing and Description of Updates" Attachment 1. Include supporting calculations.
 - b. Please provide the impact on 2005 revenues and expenses, by account, for the new Rider M customer identified in the response to CA-IR-584 and mentioned in HECO's 5/4/05 "Listing and Description of Updates" under "Electric Sales Revenues" item ii.
 - c. Please provide the quantification of the Energy Cost Adjustment Factor update using 5/1/05 contract fuel and purchased energy prices as mentioned in HECO's 5/4/05 "Listing and Description of Updates" under "Electric Sales Revenues" item iii. Include supporting workpapers and calculations.
 - d. Please provide the impact on 2005 fuel costs from the combined impact of the revised 2005 sales forecast and the use of 5/1/05 contract fuel and purchased energy prices. Include supporting workpapers and calculations.
- DOD/HECO-IR-11-2. HEI incentive compensation. Refer to the response to CA-IR-653(b).

 Please show exactly how "the labor rates have been adjusted to remove any incentive compensation expense" and include supporting workpapers and calculations.

CERTIFICATE OF SERVICE

I hereby certify that one copy of the foregoing <u>ELEVENTH SUBMISSION OF</u>

<u>INFORMATION REQUESTS</u> was duly served upon the following parties, by personal service, hand-delivery, and/or U.S. mail, postage prepaid, and properly addressed pursuant to HAR sec. 6-61-21(d).

William A. Bonnet Vice President, Government and Community Affairs Hawaiian Electric Company, Inc. P.O. Box 2750 Honolulu, Hawaii 96840

Patsy H. Nanbu Director, Regulatory Affairs Hawaiian Electric Company, Inc. P.O. Box 2750 Honolulu, Hawaii 96840

Thomas W. Williams, Jr., Esq. Peter Y. Kikuta, Esq. Goodsill Anderson Quinn & Stifel 1800 Alii Place 1099 Alakea Street Honolulu, Hawaii 96813

Department of Commerce and Consumer Affairs State of Hawaii Division of Consumer Advocacy 335 Merchant Street, Room 326 Honolulu, Hawaii 96813 6 Copies

DATED: Honolulu, Hawaii, May 27, 2005

RANDALL Y.K. YOUNG

Associate Counsel

Naval Facilities Engineering Command,

Pacific